

**IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

NORTH JERSEY MEDIA GROUP INC.,

Plaintiff

v.

MARJORIE ADAMS AND JOHN DOES NOS. 2-
5 ALL D/B/A STOOPIDHOUSEWIVES.COM,

Defendants.

Civil Action No. 12-cv-6152 (VM)(KNF)

NOTICE OF MOTION TO DISMISS

PLEASE TAKE NOTICE that upon the accompanying Affidavit of Marjorie Adams sworn to December 21, 2012, the exhibit thereto, and the Memorandum of Law in Support of Defendant's Motion to Dismiss for Lack of Personal Jurisdiction and Improper Venue in the above-captioned matter, Defendant Marjorie Adams, by and through the undersigned, moves this Court for an Order dismissing the Amended Complaint in its entirety pursuant to Federal Rules of Civil Procedure 12(b)(2) and 12(b)(3).

Respectfully submitted,

Dated: December 21, 2012

By: /s/ Anthony W. Brooks
Anthony W. Brooks (*admitted pro hac vice*)
abrooks@webblaw.com
PA I.D. 307446
The Webb Law Firm
One Gateway Center
420 Ft. Duquesne Blvd.
Suite 1200
Pittsburgh, PA 15222
Telephone (412) 471-8815
Facsimile (412)471-4094

Maria A. Savio (MAS-7756)
msavio@grr.com
Gottlieb, Rackman & Reisman, P.C.
270 Madison Avenue
New York, NY 10016
Telephone: (212) 684-3900
Facsimile: (212) 684-3999

Attorneys for Defendants
Marjorie Adams and John Does Nos. 2-5

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of Defendants' Motion to Dismiss has been served via the Court's CM/ECF system to all counsel of record on this 21st day of December, 2012.

/s/ Anthony W. Brooks
Anthony W. Brooks

Attorney for Defendants